

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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SEAFARERS PENSION PLAN,	)	
derivatively on behalf of THE BOEING	)	
COMPANY,	)	DOCKET NO. 1:19-cv-08095
	)	
Plaintiff,	)	
v.	)	
	)	
ROBERT A. BRADWAY, <i>et al.</i> ,	)	
	)	
Defendants,	)	
and	)	
	)	
THE BOEING COMPANY,	)	
	)	
Nominal Defendant.	)	
	)	

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**DECLARATION OF CAROL V. GILDEN IN SUPPORT OF PLAINTIFF SEAFARERS  
PENSION PLAN’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
PROPOSED SETTLEMENT**

CAROL V. GILDEN declares as follows:

1. I am a partner of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”), counsel for Plaintiff Seafarers Pension Plan (“Plaintiff”) in the above-captioned action (the “Federal Action”) and the related putative class action filed in the Delaware Court of Chancery (the “Delaware Court”), *Seafarers Pension Plan v. Bradway, et al.*, C.A. No. 2020-0556-MTZ (the “Delaware Action” together with the Federal Action, the “Actions”). I submit this declaration in further support of Plaintiff’s Unopposed Motion for Preliminary Approval of Proposed Settlement.
2. Attached hereto as Exhibit 1 is a true and correct copy of the “Stipulation and Agreement of Compromise, Settlement, and Release,” dated August 10, 2022, along with its Exhibits A-G.

Dated: August 10, 2022

Respectfully submitted,

/s/ Carol V. Gilden

**COHEN MILSTEIN SELLERS & TOLL PLLC**

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